

# Exhibit A

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PHILIP SAUNDERS,	)	SUPERIOR COURT OF NEW JERSEY
	)	LAW DIVISION: ESSEX COUNTY
Plaintiff(s),	)	
	)	Docket No.:
vs.	)	
MARGARET SHAW, GREYHOUND LINES	)	COMPLAINT AND JURY DEMAND
INC., JOHN DOE NOS. 1-10 and XYZ	)	
CORP. NOS. 1-10,	)	
	)	
Defendant(s).	)	

Plaintiff PHILIP SAUNDERS by way of Complaint against Defendant(s) MARGARET SHAW, GREYHOUND LINES, INC., JOHN DOE NOS. 1-10 and XYZ CORP. NOS. 1-10, says:

**PARTIES**

1. Plaintiff, Philip Saunders ("Plaintiff"), is a New York resident who resides in New York, NY.
2. Defendant, Margaret Shaw ("Defendant" and/or "Shaw"), upon information and belief, is an employee of defendant Greyhound Lines, Inc. who has an unknown address and who may have owned, operated and/or maintained, a vehicle involved in the accident which forms the basis of this Complaint.
3. Defendant Greyhound Lines Inc. ("Defendant" and/or "Greyhound") is a Texas entity with a principal place of business located at 350 North Saint Paul St., Dallas, TX 75201,

and that may have owned, operated and/or maintained, a vehicle involved in the accident which forms the basis of this Complaint.

4. Defendants John Doe Nos. 1-10 are fictitious individuals unknown at this time who may have owned, operated and/or maintained, a vehicle involved in the accident which forms the basis of this Complaint.
5. Defendants XYZ Corp. Nos. 1-10 are fictitious entities unknown at this time that may have owned, operated and/or maintained, a vehicle involved in the accident which forms the basis of this Complaint.

**COUNT 1: NEGLIGENCE CAUSING PERSONAL INJURY**

6. On or about November 4, 2019, Defendant Shaw was driving a bus by Defendant Greyhound, which motor vehicle was being operated as a permissive user of the owner and/or as the agent, servant and/or employee of the owner, on Edison Place approaching Newark Penn Station in Newark, NJ when she struck the bottom of the Amtrak bridge.
7. At all times relevant here, Plaintiff was a passenger in Defendant's bus.
8. Defendants did so negligently and carelessly own, operate and/or maintain the aforesaid motor vehicle so as to cause same to strike the Amtrak bridge.
9. As a direct and proximate result of the aforesaid negligence of Defendant(s), Plaintiff was caused to sustain and did sustain serious and permanent personal injuries requiring the care and treatment of physicians, hospitalization and medication and has been and will in the future continue to be hampered in his daily routine.

**WHEREFORE,** Plaintiff(s) demand judgment against Defendants for damages, interest, costs of suit, attorneys' fees and such other and further relief that the Court deems just and proper.

Dated: October 7, 2021

/s/ Michael J. Goldstein, Esq.

Michael J. Goldstein, Esq.  
Attorney for Plaintiff(s)

**CERTIFICATION**

I hereby certify that, pursuant to R 4:5-1., the matter in controversy is not the subject of any other action or pending in any Court or of any arbitration proceeding and no such action or proceeding is contemplated. I know of no other party who should be joined in this action.

/s/ Michael J. Goldstein, Esq.

Michael J. Goldstein, Esq.  
Attorney for Plaintiff(s)

**DESIGNATION OF TRIAL COUNSEL**

PLEASE TAKE NOTICE that pursuant to R. 4:25.4, Michael J. Goldstein, Esq., is hereby designated trial counsel in this matter.

**JURY DEMAND**

Plaintiffs demand a trial by jury on all issues

Dated: October 7, 2021

/s/ Michael J. Goldstein, Esq.

Michael J. Goldstein  
Attorney for Plaintiff

## Civil Case Information Statement

### Case Details: ESSEX | Civil Part Docket# L-007514-21

**Case Caption:** SAUNDERS PHILIP VS SHAW MARGARET

**Case Initiation Date:** 10/07/2021

**Attorney Name:** MICHAEL J GOLDSTEIN

**Firm Name:** GOLDSTEIN & GOLDSTEIN, LLP

**Address:** 60 EVERGREEN PL STE 502

EAST ORANGE NJ 07018

**Phone:** 9736758277

**Name of Party:** PLAINTIFF : SAUNDERS, PHILIP

**Name of Defendant's Primary Insurance Company**

(if known): None

**Case Type:** AUTO NEGLIGENCE-PERSONAL INJURY (VERBAL THRESHOLD)

**Document Type:** Complaint with Jury Demand

**Jury Demand:** YES - 12 JURORS

**Is this a professional malpractice case?** NO

**Related cases pending:** NO

**If yes, list docket numbers:**

**Do you anticipate adding any parties (arising out of same transaction or occurrence)?** NO

**Are sexual abuse claims alleged by:** PHILIP SAUNDERS? NO

### THE INFORMATION PROVIDED ON THIS FORM CANNOT BE INTRODUCED INTO EVIDENCE

CASE CHARACTERISTICS FOR PURPOSES OF DETERMINING IF CASE IS APPROPRIATE FOR MEDIATION

**Do parties have a current, past, or recurrent relationship?** NO

**If yes, is that relationship:**

**Does the statute governing this case provide for payment of fees by the losing party?** NO

**Use this space to alert the court to any special case characteristics that may warrant individual management or accelerated disposition:**

**Do you or your client need any disability accommodations?** NO

**If yes, please identify the requested accommodation:**

**Will an interpreter be needed?** NO

**If yes, for what language:**

**Please check off each applicable category:** Putative Class Action? NO Title 59? YES Consumer Fraud? NO

I certify that confidential personal identifiers have been redacted from documents now submitted to the court, and will be redacted from all documents submitted in the future in accordance with *Rule* 1:38-7(b)

10/07/2021

Dated

/s/ MICHAEL J GOLDSTEIN

Signed